



City of Atlanta
Department of Grants and Community Development
Consolidated Annual Performance and Evaluation Report
(CAPER)
2020

Final Draft – May 2021

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

In compliance with regulations from the U.S. Department of Housing and Urban Development (HUD), the City of Atlanta developed the 2020 Consolidated Annual Performance and Evaluation Report for the reporting period of January 1, 2020 to December 31, 2020. The CAPER presents the City's accomplishments and progress toward its Five -Year Consolidated Plan 2020-2024 goals that align and focus funding from the CPD formula programs: Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, Housing Opportunities for Persons with AIDS (HOPWA) and Emergency Solutions Grant (ESG) Program to meet affordable housing and community development needs. The City of Atlanta is the recipient of (4) four annual entitlement grants from the U. S. Department of Housing and Urban Development (HUD). These grants are: The Community Development Block Grant (CDBG); the Home Investment Partnership program (HOME); the Emergency Solutions Grant (ESG); and the Housing Opportunities for Persons With AIDS (HOPWA) program.

- CDBG funding is designated to address a variety of services and needs, with a portion covering community development needs such as neighborhood stabilization, code enforcement, public infrastructure improvements and economic development
- HOME funding is designated to address affordable housing for low-income households; multi-family and single-family development – including down payment assistance
- ESG funding is designated to provide homeless assistance and homeless prevention
- HOPWA funding is designated to housing and related supportive services for low-income persons with HIV/AIDS

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

The following Table (Table 1) lists the City of Atlanta's chosen goals outcomes indicators (GOI) for the 2020-2024 Consolidated Plan and the Actual Accomplishments reported for the 2020 project year as reported by funded agencies.

Goal	Indicator	Unit of Measure	Expected - Strategic Plan (5-Years)	Actual Accomplishments 2020
Economic Development and Small Business Incentives	Jobs created/retained	Jobs	471	52
Fair Housing, Housing Counseling, Legal Services	Public service activities for Low/Moderate Income Housing Benefit:	Households Assisted	60	288
Housing/Support Services for People with HIV/AIDS	Public service activities for Low/Moderate Income Housing Benefit:	Persons Assisted	20912	5478
Housing/Support Services for People with HIV/AIDS	Tenant-based Rental Assistance / Rapid Rehousing	Households Assisted	1972	683
Housing/Support Services for People with HIV/AIDS	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	1845	498
Housing/Support Services for People with HIV/AIDS	Homeless Prevention	Persons Assisted	1339	306
Housing/Support Services for People with HIV/AIDS	Housing for People with HIV/AIDS added	Household Housing Unit	58	46

Housing/Support Services for People with HIV/AIDS	HIV/AIDS Housing Operations	Household Housing Unit	1274	864
Planning and Administration	Other	Other	1	
Public Facilities and Infrastructure	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	23121	
Public Services	Public Service Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	776	
Affordable Housing Supply and Support	Rental Units Constructed	Household Housing Unit	41	
Affordable Housing Supply and Support	Rental Units Rehabilitated	Household Housing Unit	57	33
Affordable Housing Supply and Support	Homeowner Housing Added	Household Housing Unit	4	
Affordable Housing Supply and Support	Homeowner Housing Rehabilitated	Household Housing Unit	455	6
Affordable Housing Supply and Support	Direct Financial Assistance to Homebuyers	Households Assisted	159	9

Affordable Housing Supply and Support	Tenant-based Rental Assistance / Rapid Rehousing	Households Assisted	82	
Assistance for Currently Homeless Persons and Families	Public Service Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1214	3642
Assistance for Currently Homeless Persons and Families	Tenant-based Rental Assistance / Rapid Rehousing	Households Assisted	901	14
Assistance for Currently Homeless Persons and Families	Homeless Person Overnight Shelter	Persons Assisted	2009	1356
Assistance for Currently Homeless Persons and Families	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	662	
Assistance for Currently Homeless Persons and Families	Homeless Prevention	Persons Assisted	1496	335
Blight Reduction and Neighborhood Cleanup	Buildings Demolished	Buildings	112	
Blight Reduction and Neighborhood Cleanup	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	5587	

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City's CDBG funds were used for a variety of eligible activities. The program is a flexible source of funding for a broad range of community development activities. During 2020, funding was used for: (1) improving existing public infrastructure improvements, ADA upgrades, blight remediation, storm drainage and sewer system construction, street and sidewalk improvements; (2) increased economic activities supporting programs to stimulate the revitalization of targeted business districts and to support commercial and industrial development in other eligible areas. Empower and train low income citizens to increase their access to education, employment and career opportunities; and (3) Promote the preservation of a quality housing stock through the rehabilitation of single family units and assist businesses to renovate or restore commercial building exterior facades, (4) improve energy efficiency, (5) housing for homeless persons and families , (6) rental assistance and (7) the implementation of fair housing regulations.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

Race	CDBG	HOME	ESG	HOPWA
White	369	0	50	122
Black or African American	4376	23	883	1749
Asian	20	0	1	5
American Indian or American Native	24	0	6	1
Native Hawaiian or Other Pacific Islander	11	0	0	2
Total	4800	23	965	1879
Hispanic Ethnicity	58	0	47	45
Non Hispanic Ethnicity	4742	23	918	1,834

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

CDBG: The activities carried out utilizing CDBG funds for Program Year 2020 were consistent with the objectives of the Consolidated Plan Strategy. CDBG funds were used to provide housing and non-housing program activities. With the funds available, the City was able to offer consistent services as described in the Annual Action Plan. A total of 4,950 were served. Non-housing activities served 3,926 persons and housing activities serviced 1,024 households. Of those 4,950 served with CDBG funds 369 were white, 4376 were Black/African American, 20 Asian, 24 American Indian/American Native, 11 Native Hawaiian/Other Pacific Islander, 2 Native American and White, 20 Black/African American and White and 128 of those assisted were multi-racial. Of those 4,950, 58 were ethnically Hispanic.

HOME: The activities carried out for the HOME program year 2020 were consistent with the objectives of the Consolidated Plan Strategy. The City's overall goal was to promote and strengthen the stability, development, revitalization, and preservation of the City of Atlanta neighborhoods. There are several housing objectives that contribute to helping achieve this goal, including: increasing homeownership opportunities for very low-income and moderate-income residents, providing opportunities for low income renter households, and rehabilitation of single family and/or multifamily housing which served 23 households: 23 were Black/African American.

HOPWA: The activities carried out utilizing HOPWA funds for Program Year 2020 were consistent with the objectives of the Consolidated Plan Strategy. HOPWA funds provided housing assistance to persons living with HIV/AIDS and their family members. The racial/ethnic composition of the 1,926 households

assisted was: **122** White, **1,749** Black/African American, Black/African American and White 12, Native American and Black/African American 10, 5 Asian, 1 Native/American or Alaskan Native, 2 Native Hawaiian/Other Pacific Islander and 21 Other Multi-Racial. Of these, 45 identified as Hispanic.

ESG: The activities carried out utilizing ESG funds for Program Year 2020 were consistent with the objectives of the Consolidated Plan Strategy. ESG funds were designed and used as the first step in a continuum of assistance to prevent homelessness and enable homeless individuals and families to move toward independent living. The racial/ethnic composition of families **980** assisted with ESG funds were as follows: **50** White, **898** Black/African Americans, **1** Asian, **6** American Indian or American Native, and **2** Native Hawaiian/Other Pacific Islander and **22** multiple races. Of these, **47** identified as Hispanic.

*(noted all others are add in Black or African American).

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$7,156,340	\$3,857,889.37
HOME	public - federal	\$2,113,138	\$94,179.33
HOPWA	public - federal	\$22,795,464	\$18,142,117.89
ESG	public - federal	\$627,336	\$38,076.99
CDBG-CV	Public – federal	\$4,209,808	0
ESG-CV	Public-federal	\$5,866,829	0
HOPWA-CV	Public-federal	\$14,282,413	0

Table 3 - Resources Made Available

Narrative

During 2020, the City received an allocation of \$57,061,328 of federal fiscal year consolidated formula funds; however, funds awarded, or loan commitments made during this program year may have utilized funds from previous federal funding years, recaptured funding and program income. In addition, this year COVID relief dollars were added. Delays in expenditure reporting account for the lack of expenditure documented in the table above.

CDBG: During the program year 2020 the City undertook and successfully administered several CDBG-funded projects. Activities included acquisition of real property, ADA upgrades, blight remediation, energy conservation, public services, affordable housing, economic development, enhanced code enforcement, child care services, senior services, and public facility and infrastructure improvements. The City generated program income in the amount of **\$1,044,006.43** from the repayment of housing rehabilitation and business improvement loans. The total amount of CDBG funds expended toward eligible CDBG projects, including administrative costs and sub-recipient was **\$3,349,866.33** . All funds were not drawn before end of program year.

ESG: During the program year 2020 ESG funds were used for emergency and transitional shelter operations, direct services for homeless individuals/households through essential services, homelessness prevention services/interventions and rapid re-housing. The total amount of ESG funds expended including administrative cost was \$12,347.95 . In addition to the ESG funds, the City met the

requirement to match ESG funds dollar-for-dollar. Delays in expenditure reporting account for the lack of expenditure documented in the table above.

HOME: During the program year 2020 the City undertook a variety of HOME-funded projects that provided direct housing services for(, first-time homebuyer assistance, tenant-based rental assistance, and affordable rental housing opportunities which included project administration costs. The HOME program generated program income in the amount of **\$1,107,389.31** all of which was recommitted to other HOME eligible projects in 2020. The total amount of HOME funds expended during the program year was \$94,179.33 .

HOPWA: During the program year 2020 HOPWA funded projects included housing assistance; tenant-based rental assistance (TBRA), short-term rent, mortgage and utility (STRMU) assistance, housing facility operations, housing information, support services/resource identification, and grantee/project sponsor administration. The City expended **\$18,142,117.89** in funding towards eligible projects. Program income in the amount of \$119,879.24 was earned from projects sponsors that provided facility-based housing assistance: community residence or master-leased units, collected rent payments from participants, and returned security deposits. Project sponsors generated and used the program income to further assist the individual/households and/or deducted it from allowable expenses subject to reimbursement.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Atlanta EMSA	70	65	Other: HOPWA
City of Atlanta	15	31	Other: CDBG and ESG
COMMUNITY DEVELOPMENT IMPACT AREA	15	4	Services provided: neighborhood improvements, community courts, code compliance and facilities and I Demolition

Table 4 – Identify the geographic distribution and location of investments

Note: Allocation Amount in table represents Award percentage not expenditures

Narrative

The City of Atlanta uses its entitlement awards to assist in three designated eligible geographic service areas: the City of Atlanta, The Atlanta-Sandy Springs-Roswell EMSA, and local Community Development Impact areas. Eligible geographic areas vary based on entitlement grant type.

CDBG projects are allocated to specific geographic areas based on the Community Development Impact Area or CDIA. (see map in appendix) The CDIA consists of those census block groups in which at least

51% of the households earn less than 80% of the City median income, based on 2010 U.S. Census data. The CDIA geographic areas are also referred to as low- and moderate-income areas. The City's Department of Grants and Community and Development work with developers to promote development in these areas; 70 units are under contracts with HOME and CDBG funds.

The City continued to target its CDBG investments in public infrastructure, blight elimination and economic development to the Community Development Impact Area or CDIA to continue to support the revitalization of the neighborhoods that make up the CDIA. CDBG public services activities of shelter, childcare, job training and placement, substance abuse facilities, etc. were focused in the City of Atlanta.

This CDIA targeting represents 90% of the 2020 CDBG funding. However, when comparing the CDBG total awards amount of \$57M to the total planned funding for all City entitlement grant activities, the CDIA-targeted CDBG continues to be only a small percentage of all the planned funding at **20%**.

HOPWA programs serve the Atlanta-Sandy Springs-Roswell, GA EMSA (Eligible Metropolitan Statistical Area) which represents a 20-county area. Priority funding is given to projects working in City of Atlanta, Fulton, DeKalb, Gwinnett, Cobb and Clayton counties which have the highest incident of HIV disease in the 29-county EMSA. A full listing of the 29-county EMSA service area is included in the appendix.

ESG funded emergency shelters and homeless facilities., social services for homeless, elderly and disabled, housing repairs for seniors and emergency repairs are focused on projects within the City of Atlanta.

See Attachments (2) : CDIA and EMSA MAPS

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Federal funds were leveraged by private, state and local funds, where applicable. The City complied with all HOME and ESG matching fund contribution requirements as specified in 92.218 of the HOME regulations and ESG 24 CFR § 576.201.

CDBG: During program year 2020 , a total of \$3,857,889.37 in CDBG funds were leveraged with traditionally available resources in a variety of ways: general funds and general obligation bonds (affordable housing, public services, public improvements, program monitoring), and grants awarded to the Atlanta's CoC from the Substance Abuse and Mental Health Services Administration (to assist High-Risk/High-Need homeless with treatment services and assisting veterans with mental and substance abuse problems). CDBG grant funds allow the City to reach further into the community to help more residents and effect greater change and increase the impact of CDBG funded activities through education, code compliance enforcement, training opportunities, social service offerings, economic development, job creation, affordable housing construction, and repairs for qualifying homeowners.

HOME: The City of Atlanta's Department of Grants and Community Development (DGCD) continues to provide matching funds of twenty-five cents to the dollar as mandated by HUD. DGCD Fiscal staff maintains a Match log noting all sources of excess and the liability noted projects that were drawn.

HOPWA: During the program year 2020 **\$18,142,117.89** in HOPWA funding was expended, with \$8,115,801.78 in other funds leveraged to provide services for clients in the program (including resident rents), yielding a leveraging ratio of 123%. The City of Atlanta has **20** project sponsors partners providing services to eligible persons under the HOPWA program. In addition to HOPWA, most of these partners receive funding for housing and HIV/AIDS services from other grant sources, which are used in conjunction with HOPWA funding to provide clients with a broad range of supportive services in the continuum of care.

ESG: The City of Atlanta leveraged ESG funds during the program year 2020. The City, as well as its sub-recipients, are required to match ESG funds dollar-for-dollar. Matching funds in the amount of **\$12,347.95** consisted of the following:

- Cash match funding spent on ESG-eligible activities, including program income

- Value or fair rental value of any donated material or buildings used for ESG programs
- Salary paid to staff to carry out programs and services provided by the sub-recipient
- Volunteers providing professional services such as medical or legal services are valued at the reasonable and customary rate in the community

Matching funds documentation was submitted by sub-recipients to ensure match requirements were met. Matching funds were considered allowable only after HUD signed the grant agreement and during the effective period of performance of sub-recipient contracts.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	111,537,008
2. Match contributed during current Federal fiscal year	60,380
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	111,597,388
4. Match liability for current Federal fiscal year	400,444
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	111,196,944

Table 5 – Fiscal Year Summary - HOME Match Report

MATCH CONTRIBUTION FOR THE FEDERAL FISCAL YEAR								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
782Jones	3/27/2020	\$1,000	-	\$195,000	-	-	-	\$5,000
585King	3/31/2020	\$1,000	-	\$123,000	-	-	-	\$3,880
957Towns	6/24/2020	\$500	-	\$162,000	-	-	-	\$7,000
887Kenon	8/20/2020	\$1,026	-	\$240,000	-	-	-	\$20,000
585Ross	8/31/2020	\$1,000	-	\$120,000	-	-	-	\$4,000
2731Diaz-Matosas	9/18/2020	\$1,000	-	\$155,000	-	-	-	0
3413Wells	10/20/2020	\$2,000	-	\$214,000	-	-	-	0
10 Hollingsworth	10/27/2020	\$2,000	-	\$204,000	-	-	-	0
1000 Johnson	11/05/2020	\$1,000	-	\$179,500	-	-	-	\$19,500
3640Fleming	11/16/2020	\$1,500	-	\$145,000	-	-	-	0
249Sonsteng	11/20/2020	\$1,500	-	\$157,000	-	-	-	\$1,000

Table 6 – Match Contribution for the Federal Fiscal Year

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
1,078,125.33	1,107,389.31	0	0	

Table 7 – Program Income

HOME MBE/WBE

report

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0

Sub-Contracts						
Number	5	0	0	2	0	3
Dollar Amount	\$44,914	0	0	\$16,669	0	\$28,245
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	15	0	15			
Dollar Amount	\$44,914	0	\$44,914			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0	0			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	136	14
Number of Non-Homeless households to be provided affordable housing units	16	9
Number of Special-Needs households to be provided affordable housing units	783	683
Total	935	706

Table 11 – Number of Households Provided Units

	One-Year Goal	Actual
Number of households supported through Rental Assistance	919	1003
Number of households supported through The Production of New Units	49	9
Number of households supported through Rehab of Existing Units	142	85
Number of households supported through Acquisition of Existing Units	2	0
Total	1112	1097

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

In 2020, the City of Atlanta exceeded its one-year goals for affordable housing units and household support. Numbers for construction and rehabilitation are down, due to delays in the official close-out of HOME projects in IDIS and construction delays associated with COVID. These numbers are expected to increase significantly in the 2021 CAPER due to the delay of planned 2020 closeouts combined with planned 2021 closeouts expected to complete on schedule, and the City will be on track to meet its 5-year goal despite this fluctuation.

14 homeless households were provided affordable housing units through HOME tenant based rental assistance, via the Nicholas House TBRA program and HOPWA TBRA programs.

- 9 non-homeless households were provided affordable housing units; through Home Owner programs and Limited Rehab activities.

The City acknowledges that there were many contributing factors which include (but are not limited to) timeliness of contract execution, new internal processes at the City's newly established Department of Grants and community Development, and the overall management of the entitlement programs. However through the restructure of the DGCD, the City believes it is on track for significant improvements in efficiency. The DGCD will address past barriers to success while providing new opportunities to assist citizens and strive to exceed its goals in the upcoming year.

Discuss how these outcomes will impact future annual action plans.

The City of Atlanta annually assesses its progress in meeting goals outlined in the FY 2020-24 Consolidated Plan through the development of the Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER provides an opportunity for the City to evaluate the performance of its programs and services to determine whether modifications to the current 5-year goals are needed. The restructure into the newly formed Department of Grants and Community Development will enable maximum output of the entitlement programs in the future as the organization has strengthened its policies, procedures, and staff capacity. Accordingly – staff efforts to examine performance and productivity in the department will impact our overall systems planning. DGCD will ensure that beneficiary information and program activities are reported monthly to maintain accurate tracking of data.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	4330	14
Low-income	486	1
Moderate-income	134	8
Total	4950	23

Table 13 – Number of Households Served

Narrative Information

Activities supported in 2020 Program Year CDBG funds included: acquisition of real property, small business loans, code enforcement, sidewalks and infrastructure, senior services, and childcare services.

Information gathered throughout all the programs offered indicates CDBG funds were used to assist 4330 extremely low-income households (less than or equal to 30 percent Area Median Family Income (AMFI)), 486 low-income households (greater than 30 percent but less than or equal to 50 percent AMFI) and 134 moderate-income households (greater than 50 percent but less than or equal to 80 percent AMFI) for a total of **4950** households.

HOME: Activities supported 2020 Program Year HOME funds included rental assistance, tenant based rental assistance, and first time homebuyer assistance. Please note, the COVID Pandemic has severely delayed several projects and activities, As a result, subrecipients have been granted extensions to complete their projects. Accomplishments for these activities will be captured in future CAPERS and reported under the appropriate goals and programs.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City continues to work in conjunction with the Continuum of Care (CoC) to facilitate a unified approach to outreach and access to resources. Partners for Home has been contracted by the City of Atlanta to manage the Atlanta CoC Coordinated Entry system. This system was first piloted in 2015 with a focus on permanent supportive housing and fully implemented in 2016 to include rapid re-housing resources.

Coordinated Entry is a system-wide assessment, referral, and placement process to determine the best housing and service options for every homeless individual and/or families. This system of services and housing interventions is accessed through street outreach services, interface with jails, hospitals, abandoned buildings and libraries, under bridges, in parks, and at the bus station and airport. Homeless individuals/families are assessed at the Coordinated Access Point(CAP) using the VI-SPDAT assessment tool to determine and prioritize housing and/or service needs. Permanent supportive housing and rapid rehousing are prioritized based on vulnerability and severity of service needs to ensure that assistance is prioritized and accessed. The City of Atlanta also contracts with Partners for Home to manage the annual Point In Time (PIT) Count which allows the total number of homeless individuals to be captured and reported yearly. Through organization collaborations, referrals and the PIT count process, we are able to identify the gaps in services and area of immediate needs that can be addressed.

HOPWA eligible individuals and families are directed to the Central Intake provider who manages and coordinates referrals to available resources for HOPWA housing opportunities and other relevant programs. This process is also a coordinated effort to assist HOPWA individuals.

Addressing the emergency shelter and transitional housing needs of homeless persons

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City awarded 17 emergency shelters and shelter operations with ESG and CDBG funds, which together were able to serve approximately **1,154** individuals. For other non-special needs category awards made, the majority went to providers working with the homeless to offer temporary housing, transitional housing, and permanent supportive housing with substance use disorders, addiction or mental illness services. Women, women with children, males, transgender, veterans, and all other family compositions were served.

The Mayor's Initiative of addressing the homeless on cold frigid nights continued in 2020. During cold weather, warming centers are available, adding safe beds to the daily nightly emergency portfolio throughout the City of Atlanta. As temperatures fell below freezing, the centers were activated and staffed by City workers, as well as volunteers. The homeless residents were provided transportation, meals and other necessities for men, women and children at these warming center locations. The City provided approximately over 30 nights of shelter serving over 300 individuals a night.

Atlanta's CoC Lead Agency - Partners for Home conducted **Point-In-Time Count** on January 27, 2020, with 340 volunteers and over 2500 hours of participation. The PIT count, indicated that the number of homeless showed a slight increase in the number of people who identified as homeless. However, while the total number is up, unsheltered homelessness is down and the emergency sheltered population is increased.

Since 2015 within the City of Atlanta PIT geographic area, there has been a 25% decrease in homelessness in general, composed of a 30% decrease in sheltered homelessness, and a 10% decrease in unsheltered homelessness. However, these numbers do vary year to year. Between the 2019 and 2020 counts there was observed a slight .007% increase in homelessness, an 8% decrease in sheltered homelessness and a 31% increase in unsheltered homelessness.

Gathering data allows the City of Atlanta and the Atlanta Continuum of Care (CoC) to make educated decisions about how to best address homelessness. Data driven decisions allow for proper allocation of resources and also help the community find gaps in the system. The Atlanta CoC, which is comprised of over 100 organizations, works together to address homelessness, with the goal to make it rare, brief, and nonrecurring.

Helping homeless persons (especially chronically homeless individuals and families, families

with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City of Atlanta is committed to having the appropriate housing interventions available for individuals and families who are homeless and has continued to work with consultants, HUD technical assistants and City planners to reconfigure the CoC and City funded portfolio to provide housing options that will best serve people who are homeless. In previous years, this entailed focusing the funding on permanent housing solutions. Emergency and short term assistance has been utilized in collaboration with rapid re-housing funding from both City and non-City sources in order to minimize the time unsheltered.

The Atlanta Consolidated plan for 2020-2024 identifies Affordable Housing Supply and Support, Safe Sanitary, Low-Barrier Housing and Support Services for People Living with HIV/AIDS, and Assistance for Currently Homeless Persons and Families as High-priority needs.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Atlanta Housing is the citywide agency that is designated as a PHA and specifically has jurisdiction to address public housing needs. Therefore, Entitlement funds are not encumbered for activities addressing public housing needs directly. Each year, Housing Authorities must complete a PHA Action plan. This Plan is a comprehensive guide to public housing agency (PHA) policies, programs, operations, and strategies for meeting local housing needs and goals. AH's business model positions the agency to pursue three goals:

Q1. Quality Living Environments – provide quality affordable housing in healthy mixed-income communities with access to excellent quality-of-life amenities. 2. Self-Sufficiency – (a) facilitate opportunities for families and individuals to build economic capacity and stability that will reduce their dependency on subsidies and help them, ultimately, to become financially independent; (b) facilitate and support initiatives/strategies to support great educational outcomes for children; and (c) facilitate and support initiatives that enable the elderly and persons with disabilities to live independently with enhanced opportunities for aging well; and to improve health and wellness for all residents. 3. Economic Viability – maximize AH's financial soundness and viability to ensure sustainability of its investments and portfolio of properties.

Specifically, OHCD works collaboratively and serves as the co-lead for the Choice Neighborhood program, which is a community revitalization strategy focused on housing, neighborhoods, and people. The project does prioritize providing housing assistance and wraparound services to the former residents of the University Homes public housing site. While the housing components of the project are mixed-income, the housing authority intends to invite former residents to relocate to the site upon completion in December 2019.

In addition to supporting the work of Atlanta Housing, the DGCD is also a Public Housing Authority (PHA) through our Section 8 Moderate Rehab program. Through this program we serve 144 formerly homeless residents and families.

Actions taken to address the needs of public housing cont'

The City of Atlanta currently administers a unit-based rental subsidy for three project based properties totaling 144 units. Through the Section 8 Moderate Rehab Program, subsidies provide rental support for 100 individuals that were previously homeless via Single Room Occupancy (SRO) units and rental/ utility support for 44 families in apartments. Additionally, these funds are used to service the debt incurred by the property owner for the unit rehabilitation. Support provided through the Section 8 Mod Rehab program is not transferable or portable. Participants in the Mod Rehab program only receive rental

assistance if they are living in a Mod Rehab unit. If a resident moves from a Mod Rehab unit, they relinquish their assistance. Some Mod Rehab units are specifically set-aside for the elderly, homeless, disabled and/or those with chronic illness.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

During this past year, the Atlanta Housing continued initiatives to increase home buying activity. AH's Homeownership Program (Down Payment Assistance) has one mission- to increase homeownership opportunities for low-to-moderate income first-time homebuyers through community development support, partnerships, outreach initiatives, homebuyer education and subsidy assistance. The Home Buyer must qualify and be approved for a 30-year fixed rate Conventional, FHA or VA loan through first mortgage lenders. Subsidy assistance may be up to \$20,000 for first-time home buyers; and up to \$25,000 for first-time home buyers who are professionals or para-professionals in health, public safety, education, a veteran, and/or Section 8. AH's DPA can be used in conjunction with down payment assistance funding from other sources or agencies and reserves the right to adjust its subsidy if other sources are combined. The subsidy is often used in conjunction with Invest Atlanta's program funding provided by the City's HOME program.

Actions taken to provide assistance to troubled PHAs

N/A

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

As part of the larger zoning code rewrite process, the City of Atlanta has focused efforts on a set of Phase I and II updates to the existing code. The updates consist of a range of zoning “fixes” that include solutions to increasing housing diversity, reducing parking requirements, and allowing greater density to increase the overall supply of housing. The Phase I “fixes” were approved in 2018 and the Phase II updates went before City Council January 22, 2019. A notable component of the Phase I updates is the MR/RG Single-Family Minimum Lot Sizes. Through this update, the City seeks to provide a solution to single family and two-family housing developments in multi-family districts. Today multi-family districts allow single-family and two-family houses, however, the minimum required lot sizes for these uses are much larger than is characteristic of Atlanta’s historic patterns. The large lot sizes discourage providing single-family and two-family houses in multi-family district, even if they would be appropriate or desirable. The updates allow the following minimum lots sizes: detached single-family and two-family lot: minimum 1,000 sq ft lot, minimum 20 ft width Zero lot line (i.e. townhouses): minimum 800 sq ft lot, minimum 16 ft width (typical).

The Inclusionary Zoning Ordinances, #17-O-1542, Beltline and 17-O-1556 for the Westside, were enacted on January 29, 2018 however, the program has a full time Inclusionary Zoning Compliance person that ensures that project comply with the ordinance during the permitting and implementation of the project. The program covers all new proposed construction for multifamily rental developments with at least 10 units that are within the Beltline Overlay District or the Westside Overlay Districts.

The goal of this ordinance is to create an affordable and walkable city in which families, including law enforcement, service providers, educators, city and county employees can have affordable housing for now and the foreseeable future. **The affordability requirement shall apply for the greater of twenty (20) years from the date of the issuance of the certificate of occupancy; or such longer period from the date of the issuance of the certificate of occupancy, as permitted by state law at the time of the issuance of the building permit.**

The City of Atlanta’s IZ program mandates that developers who wish to build rental multi-family units with ten (10) or more units in the Beltline and Westside districts set aside ten (10%) of their units for individuals or households whose income is 60% or less of AMI (Area Median Income) or fifteen (15%) of their units for individuals or households whose income is 80% or less of AMI.

In-Lieu of compliance with the on-site affordability requirement, the Applicant may elect to pay an “in-lieu” fee, to be deposited into the Beltline Affordable Workforce Housing In-Lieu Fee Trust Fund,

prior to the issuance of a building permit. **In-Lieu fees from this trust fund will be used to meet the affordable housing obligation by paying for development in the same sub-area from which the developer has opted out, or in an adjacent sub-area.**

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The Mayor's platform has 5 pillars, all of which are listed below. 1) A Safe, Welcoming, and Inclusive City 2) World-Class Employees, Infrastructure, and Services 3) An Ethical, Transparent, and Fiscally Responsible Government 4) Thriving Neighborhoods, Communities, and Businesses 5) Residents who are Equipped for Success. The DGCD remains committed to advancing the Mayor's agenda through our programs and services but primarily focus our efforts on low-moderate income persons. The largest population that we serve are individuals and households with incomes at or below 50% AMI, as well as the disabled and chronically homeless. Households below 50% AMI face a high cost burden in housing while the disabled and chronically homeless face a lack of permanent supportive housing.

The Department of Grants and Community Development (DGCD) works collaboratively with our One Atlanta Office for Equity, Diversity and Inclusion to make sure that we are thoughtful and inclusive in the design and implementation of our programs and services. Additionally, the City took the following actions to address these needs:

- Continued funding Metro Fair Housing Services, Inc. (MFH) to advise tenants of their rights when facing eviction and/or violations of fair housing statutes.
- Continued working with MFH to satisfy the recommendation from the most recent Analysis of Impediments study.
- Continued funding Metro's workshops to educate residents on lender discrimination and the rights of the disabled.
- Awarded the City of Atlanta Municipal Court Homeless Court Program (HCP). This problem-solving court program was created to assist and support homeless individuals in resolving minor offense(s) and warrants that are often a result of their homelessness. The main goal of the program is to provide a more empowering and productive response to homeless defendants.
- Funded Atlanta Legal Aid Society to provide legal services for individuals experiencing homelessness.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The City seeks to reduce lead-based paint hazards by assuring compliance with federal laws; staff is trained in ensuring that those receiving down payment funding are educated about the hazards via the “Protect Your Family from Lead in Your Home” brochure. The City of Atlanta maintains staff within the DGCD that has completed the Lead Paint Inspector Risk Assessor course. In addition to the certified staff, COA typically has annual trainings that are provided to our subrecipients in coordination with our Office of Design – Historic Preservation Division and the State Historic Preservation Office. This training allows for any new HUD updates or the Georgia Environmental Protection Division who also partners with the City for Asbestos training. In 2020, this training was delayed due to COVID concerns and it is anticipated

The City of Atlanta continues to monitor our sub recipients for compliance by ensuring that the HQS and habitability inspections are enforced and inspection results from the NLLAP labs are provided in accordance with the applicable regulations. The City requires all contractors to certify through the state Office of Environmental Protection Division (EPD) to ensure compliance with the Title X Lead Based Paint regulations. Contractors must also possess certification for the Renovation, Repair and Paint Program as secondary licensing for adherence to the same regulations. If lead paint is found in the homes, contractors must submit and receive a notice to proceed from EPD and provide an occupant protection plan if seniors elect to remain in their homes for their safety. Persons who are not senior citizens do not have the ability to remain in their homes and must be relocated to premises that aren't lead contaminated. A lead clearance letter must be received and notice of the same submitted to EPD for record keeping.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Atlanta’s poverty problems are similar to those in other major urban areas. Impoverished Atlantans struggle with educational and skills gaps, homelessness, affordable housing shortages and unemployment. Although poverty is found in each quadrant of the City, these problems are most prevalent in the inner city where the majority of Atlanta’s low-income residents and neighborhoods are concentrated.

The Atlanta Worksource Development Agency (AWDA) continues to serve as the workforce system for the City of Atlanta. The agency provided job seekers with resources to attain sustainable employment and collaborated with business leaders for the recruitment and development of their labor needs. WorkSource Atlanta is MARTA accessible, with a stop in front of its corporate office. AWDA is a One-Stop Shop with multiple services which includes:

- GED preparation and assistance
- Vocational rehabilitation services
- Job readiness and interview skills training
- Computer skills development,
- Job leads and connections to job seeker to gain employment,
- Interview opportunities with prospective employers
- Additional services through partner referrals.

While a solution to assisting the significant number of Atlanta residents living in poverty are beyond the scope of the four HUD formula programs covered in the COA's Con Plan, the COA administers other programs. Strategically combining these programs addresses reducing poverty and achieving self-sufficiency. This type of engagement approach covers the gaps in service.

Amongst the services funded by the City of Atlanta are projects with the goal of teaching financial literacy, accessing public transportation, goal setting, and maintaining employment. Funded programs connect residents with referrals Atlanta Work Source for employment services, receiving GED Program services, applying for Medicaid/Food Stamps Program, and receiving items from the Furniture Bank.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

In 2020, the City of Atlanta consolidated many of its grant functions into the Department of Grants and Community Development by merging the Office of Grant Management (OGM) and the Office of Housing Services (OHS). The Department of Grants and Community Development (DGCD) is divided into two offices, the Office of Planning and Program Operations and the Office of Administrative and Technical Services. As part of DGCD, the Office of Administrative and Technical services (A&TS) is responsible for researching and identifying grant opportunities that support City initiatives. The two offices are responsible for the overall financial management of Consolidated Plan programs, review and approved grant related invoices, and draw grants funds HUD IDIS systems. Various City departments implement projects by entering into subrecipient agreements and contracts.

- DGCD staff cooperated and collaborated with other governments, the non-profit community, neighborhood planning units and citizen groups, and other more specialized groups as needed for planning and implementation of the various Plan programs.
- Because the City of Atlanta has numerous participants in the affordable housing and supportive services arenas, inter-governmental coordination is essential. The City of Atlanta cooperates with the Georgia Housing and Finance Authority to fund local projects and programs. The organizations work together to support applications for federal funds, that benefit the City.
- The City and nonprofit service providers work closely with other governmental agencies and non-profits to coordinate services and refer clients with special needs to appropriate resources.

- The City also works with State and local agencies on funding and program development issues. Other local jurisdictions and the Metro Atlanta Health Services Planning Council coordinate resources to address the problems of persons living with HIV/AIDS throughout the metropolitan area. In 2020, the City continued to process environmental assessments and clearances on behalf of the Atlanta Housing Authority.
- In 2020 the City of Atlanta worked with the HOPWA Advisory Committee to help address the impact of HOPWA Modernization and to implement strategies to strengthen program performance.
- Coordination with the City of Atlanta Continuum of Care (CoC) to address the needs of the homeless in a collaborative approach. The CoC planning is ongoing with significant involvement and input from agencies participating in the continuum. The City also works closely with the Regional Commission on Homelessness initiatives.
- The City also participates in less formal collaborations including periodic meetings of the community based housing corporations (AHAND), the Atlanta Planning Advisory Board (APAB), and others as needed.

These collaborative efforts assist the City of Atlanta in identifying and strengthening institutional structure. It helps to determine what measurements are required to overcome any gaps identified, while strengthening internal and external partnerships to continue providing services to moderate, low, and very low income citizens.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Housing affordability and retention continue to be central issues in achieving equity in our region. The COA participates in a variety of collaborative and local initiative events. The Department of City Planning participated with other Municipalities, Counties, and other Industry stakeholders in the Catalyst Regional Housing Strategy to create a regional housing strategy based on a collective impact model and data-driven approach: (1) DGCD continued the membership with Georgia Advancing Communities Together (GA ACT), which represents the state's nonprofit housing and community development organizations, (2) The Atlanta Regional Housing Forum is a quarterly gathering of affordable housing stakeholders from all sectors - private, public, nonprofit, philanthropic and concerned citizens. During this time housing stakeholders have gathered quarterly to discuss affordable housing, community development, transportation, transit, homelessness, health and other related topics. Other issues are examined such as outdated zoning practices, overly narrow funding models, counterproductive density regulations and a general lack of information all impact the region's ability to deliver housing necessary for continued economic growth of the region. The Forum is a collaborative effort of more than 20 organizations, (3) recommendations for the City of Atlanta's housing strategy. After eight months of dialogue and engagement, HouseATL and its five working groups shared their recommendations to a

group of housing advocates during the September 2018 Atlanta Regional Housing Forum, (4) In June of 2016 Atlanta received federal designation for the Westside Promise Zone (WPZ) through the U.S. Department of Housing and Urban Development. Since then, the City of Atlanta has worked to convene partners within the five Westside neighborhoods of Ashview Heights, Atlanta University Center, Castleberry Hill, English Avenue, and Vine City to advance the six Promise Zone goals. This federally designated areas is considered in high poverty communities where national and local leaders, philanthropic organizations, and community members partner together to catalyze economic activity and job growth, improve educational opportunities, increase quality affordable housing, spur infrastructure development, and reduce violent crimes, (5) Continued attending the Housing Brain Trust (HBT), redevelopment at Fort Mac meetings discussing financing options and providing expertise in housing affordability and (6) Housing Agencies: The City continues its partnership with Metro Fair Housing to address needs identified in the recently released 2020 Analysis of Impediments to Fair Housing prepared by Mosaic Community Planning, LLC (see discussion under 91.520(a) below).

The City continues its collaboration with Atlanta Housing (AH) and Invest Atlanta on revitalizing the three Choice neighborhoods of Ashview Heights, Vine City, and Atlanta University Center. AH and the City of Atlanta received a \$30 million Choice Neighborhoods Implementation Grant from HUD in 2015, and the program is in year four of its five-year period. Actions taken to enhance coordination between public and private housing and social service agencies is a key focus under the *People* component includes coordination with service providers such the Urban League of Greater Atlanta, Literacy Action, and Morehouse School of Medicine.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The City of Atlanta performs different functions within the fair housing spectrum. Primarily, actions are taken in each program area to adhere to compliance in fair housing laws. The City contracts with Metro Fair Housing (Metro) to assist residents with housing complaints and landlord/tenant issues. This contract promoted fair housing by addressing impediments found in the Analysis of Impediments. In 2020 the City of Atlanta contracted with MOSAIC Community Planning to develop an updated Analysis of Impediments to Fair Housing document. The report was a joint report for both the City of Atlanta and Fulton County. The City will continue exploring other funding sources to address all impediments identified in the AI. In 2020, the City continued to provide a dedicated fair housing page on its website with a link to file Fair Housing complaints online. Residents were provided the supportive services needed to navigate the systems for reporting Fair Housing violations through the help of Metro Fair Housing Solutions.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The DGCD served as the City's overall grant administrator ensuring implementation, reporting, and compliance with all pertinent regulations. Programs and activities adopted in the Program Year 2020 Annual Action Plan were accomplished in a timely manner and consistent with program descriptions. Programs were instructed by DGCD to maintain compliance with the HUD requirements.

DGCD staff was responsible for compliance monitoring of programs, functions, and activities funded with entitlement grant funds awarded to the City through the HUD Consolidated Plan. Department Directors were required to ensure adequate administrative oversight of the programs funded under the Consolidated Plan during the pre- and post-award periods. Compliance monitoring consisted of: 1. Reviewing reports and supporting documents submitted by sub-recipients, contractors, and in-house programs for cost reimbursement; 2. Performing on-site and/or desk reviews and 3. Verifying the delivery of services that benefit eligible beneficiaries.

DGCD and other city departments provided technical assistance (TA) to sub-recipients and contractors receiving HUD funds to ensure an understanding of contractual requirements, regulations, , guidelines and grant administrative procedures. Due to the COVID-19 pandemic DGCD had to suspend all on-site monitoring activities due to health and safety concerns. DGCD staff continued to work closely with subrecipients to address and resolve any concerns by providing ongoing desk audits and technical assistance as needed. As the newly formed DGCD is still in the restructuring process, it has identified the need to expand the policy and regulatory compliance team. In 2020 the City hired two (2) designated compliance analysts and established a Manager of Compliance position. In 2021, the City will be adding a Director of Compliance position to provide oversight to this division in GGCD.

In the award process, the City continues to conduct outreach to minority business and women-owned business enterprises (MBE/WBE). Minority and Women-Owned Business provisions are included in the City's purchasing/procurement policies. In addition, the City of Atlanta Mayor's Office of Contract Compliance (OCC) effectively serves as a liaison by linking Small, Minority, Woman and Disadvantaged Businesses with City related business opportunities and encourages equal opportunity for all businesses and individuals in the Atlanta workplace. In order to promote the use of minority and women-owned businesses, the City takes the following actions:

- Disseminate information regarding City bidding procedures and practices to the minority business community.
- Posted information on the certification process including applications.

- Required that the City's Minority Business Questionnaire be included with all City bids and Requests for Proposals.
- Provided an internal website which maintains both internal and external potential opportunities
- Provide access to a Business and Professional directory to area businesses and contractors upon request.
- Maintained and updated periodically qualified minority and women owned businesses on a Bidder List.
- Encouraged all vendors, suppliers, and contractors to maximize their opportunities in securing municipal contracts by providing links to various contracting opportunities for other jurisdictions.

During monitoring, a review of sub-recipients' compliance with MBE/WBE outreach requirements is conducted where applicable per regulations including (but not limited to): reporting requirements, eligible activities, 2 CFR 200 Uniform Administrative Requirements, Cost principles, audit, Environmental, Davis Bacon, and Section 3 requirements.

Monitoring efforts are a collaborative process between the Grantee and the Subrecipient. The City has tried to accommodate sub-recipient turn over by providing in depth TA sessions and ongoing review of submitted documentation. COVID-19 attributed many delays in the 2020 monitoring year. Delays began with the quarantine period which led to significant changes in safety protocols which significantly affected the City's ability to monitor. To adapt, the City attempted to develop virtual monitoring practices and policies. This led to a delay in monitoring due to updated requirements and safety best practices. To mitigate identified obstacles the City hired two additional compliance specialists to support the department's overall compliance efforts to include monitoring. However, during the 2020 year the City's Compliance Manager left the department in October of 2020 and the position was not able to be filled until April 2021. The hiring of the new Compliance Manager has left additional vacancies in the department, but the DGCD is working diligently to fill vacancies within the team. In the attempt to meet applicable rules and regulation the City was able to complete the following:

2020-2021 Monitoring- Compliance and Regulatory Monitoring Summary

HOPWA

Risk analysis was conducted on all HOPWA awards active during the 2020 calendar year. Seven (7) sub-recipients were selected and scheduled for HOPWA monitoring between October and December 2020, with entrance meetings conducted with each sub-recipient. One sub-recipient's monitoring has been completed and staff collected relevant monitoring documentation for review using a collaborative monitoring process with teams consisting of Management Analyst, Financial Analyst, and Compliance team member. The remaining six (6) sub-recipients scheduled to be monitored were scheduled for 2020 were placed on hold by senior management due to continued difficulties in virtual monitoring implementation and staff turnover, and scheduling changes.

CDBG/ESG

Three (3) sub-recipients were scheduled for virtual monitoring in December 2020, with letters during the third quarter sent via email to the sub-recipients. Those monitoring efforts have been scheduled to start in 2021. The requested documents have been submitted and are under review by the collaborative monitoring teams.

HOME

DGCD is responsible for managing the day-to-day operations of its HOME program, ensuring that [HOME funds](#) are used in accordance with all program requirements and written agreements, and taking appropriate action when performance problems arise per the guidance at 24 CFR 92.504(d). As the City has faced several challenges through prior years with the program, the City began several technical assistance sessions with various recipients of HOME funds based upon the audits conducted by HUD and the City's auditor to work towards curing the deficiencies within the program. With the hiring of the new compliance team, policies and procedures were in the process of revision, adaptation, and implementation. Ongoing assessment and trainings are schedule throughout FY 2021.

The City understands the requirements set forth by regulation surrounding successful implementation and execution of monitoring efforts. To address deficiencies identified in 2020 a Phased Monitoring plan has been developed and will begin 2021. The City's Phased Monitoring plan consists of a realistic ramp up of monitoring activities to include completion of Risk Tool and Remote Monitoring tools for every contract and sub-recipient. Additionally, City staff will complete Desk Monitoring reviews using developed tools on all subrecipients. Information obtain from the internal monitoring processes will be used to develop a Virtual Monitoring Schedule and to identify the sub-recipients who will participate in the 2021 Virtual Monitoring. The proposed plan allows for new sub-recipient staff to received proper notification and training on the collaborative updated Monitoring Process. The City has identified lessons learned from the attempts made in 2020 to monitor cycle during the COVID-19 pandemic and is committed to rectify all identified obstacles. The City will complete all monitoring efforts placed on hold during the 2020 monitoring cycle.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City's goal is to provide reasonable citizen participation opportunities, in accordance with local requirements and federal government regulations. To reach said goal DGCD revised its Citizen Participation Plan in 2020. This revision took place in the middle of the Covid-19 pandemic, one of the worst public health crises in recent memory. As such the revisions made to the CPP had the Covid-19 health crisis in mind. For instance, comments on the proposed ConPlan, AAP, CAPER and the revised CPP itself were obtained prior to public hearings and all public hearings were available digitally on the City's webpage. In addition, the City has created a Community Engagement Playbook. The DGCD will use this City created resource, including "the building principals and concrete plays," to better facilitate genuine and inclusive engagement for all stakeholders of Atlanta in these unprecedented times.

The comments obtained were sourced from those submitted via email to our publicly available DGCD inbox at DGCD_Planning@CityOfAtlanta.onmicrosoft.com and via physical mail which was checked regularly by staff. DGCD also made the main front desk phone number available so that those wishing to make public comment but were unable to send either physical or electronic mail could leave comment. The ConPlan, AAP and CAPER were also all made available via the Department website (www.atlantaga.gov/government/departments/grants-and-community-development) for review. Non-English-speaking persons can obtain additional information about CDBG, ESG, HOME and HOPWA programs by viewing the translator link. Additionally, to further aid those in our City's Limited English Proficient Populations the City of Atlanta has created a Language Access Plan, known as iSpeakATL. This service is open to all citizens and can be accessed via <https://www.welcomingatlanta.com/ispeakatl/>. The service offers free, timely and efficient language services to the City's LEP populations. By doing this all citizens regardless of language fluency can view and comment on performance reports.

Citizens were also provided notice and times of all public hearings via the city website. Those public hearings were available to livestream. The City also provided assistance for Non-English Speaking and Disabled residents. Those residents were able to obtain translation/interpreter assistance if notice was given forty-eight hours prior to public hearings. Citizens trying to obtain that assistance could contact the DGCD at 404-330-6390, the Office of Enterprise Assets Management at 404-330-6225, or if Deaf/Hard of Hearing dial 711 to connect with City.

DGCD adhered to the City Council's approved Citizen Participation Plan (CPP) to solicit feedback on the CAPER. The 2020 CAPER draft was made available for review from April 16, 2021 to April 30, 2021. Citizens could review the draft via the city website at www.atlantaga.gov/government/departments/grants-and-communitydevelopment and in the Office of Grants and Community Development, 55 Trinity Street, Suite 3500, Atlanta, Georgia. Comments were

provided by emailing DGCD_Planning@CityOfAtlanta.onmicrosoft.com or by calling the DGCD office line and leaving a recorded message.

DGCD made significant efforts to consult with a broad group of community stakeholders. Efforts included: Email notifications and invitations regarding the public comment period were distributed to stakeholders via the DGCD mailing list that includes existing programs, advisory committees, and interested citizens. In addition, public notice was published in one English and one Spanish language local newspaper. The City's Office of Communications shared the public notice on City social media channels, and the Atlanta City Council also posted a link to the DGCD notice on its own website. During this process DGCD received no public comments regarding our 2020 CAPER.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The Department of Planning and other City departments are continuing to work with various consultants to develop a comprehensive and data driven plan that encompasses programs, projects, and services that the City will follow based on data from various sources. The plan includes City target areas throughout Atlanta based on demographics, condition of housing stock, neighborhood needs, and other variables such as transit-oriented developments and permanent supportive housing. In 2019, the Department of City Planning began building on work from a 2018 Housing Needs Assessment and that work created a GIS story Map entitled: A City By Design Housing. This interactive story map uses very technical data and makes it easy for residents to understand. The map creates visual representations of data and most variables such as income, poverty, housing, education and employment all skew the same in the tool. This map also takes a historic approach to understanding racial segregation and how the zoning codes of the past create present day inequalities. By using GIS technology to better guide investment decisions, we are able to make more strategic investments based on the current needs of the communities, and visually see the impact of support provided. The plan is ready to implement and involves coordination with various City departments, community organizations, as well as the private sector.

The City of Atlanta submitted a plan to HUD in addressing its CDBG Timeliness. Included in that plan were some core objectives that will shift current process but not overall program objectives. These would include: **Award Selection Process** –The DGCD reconstruct the City's current project review process. In 2020 the City of Atlanta implemented the grants management software e-civis for grant applications. The award process steps include: (1) Pre-award meetings with City Departments, City Council and the Office of the Mayor to review proposals before being considered for funding; (2) New proposals were required to submit spending forecast/plans and milestone plans to be considered for funding; (3) All proposal were evaluated based on overall programmatic "value of services" vs "proposal submission" in accordance with the City's ConPlan and benefits to the citizens of Atlanta. Which includes prior performance, financial stability, timeliness of spending and outcomes met (4) DGCD will identify alternate projects in the applicable AAP that may or may not be funded initially, that can potentially be identified as viable for immediate funding and reprogramming upon quarterly CDBG program review and (5) DGCD will reconcile and anticipate each funding year to include CDBG program income in its total allocation to assist in spending delays.

Dedicated Technical Assistance for Program Participants (sub's and City departments) – The Department of Grants and Community Development has been redesigning its technical assistance program, for both internal and external partners. This will provide enhanced learning opportunities for

partner agencies during the lifecycle of the program and will give agencies the ability for capacity building training. In 2020 DGCD worked with multiple Technical Assistance providers for both internal and external training purposes including: Collaborative Solutions Inc, CloudBurst, and ICalliances.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

N/A

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During program year 2020, the City of Atlanta completed no on-site inspections of units within HOME-assisted and NSP-assisted properties as all HOME and NSP projects were in the construction phase of development.

The long-term compliance documents were received from most of the rental owners. Office staff believes that the inspections and the obtained reports were satisfactory.

A full report summarizing the results of each inspection is attached as an **Exhibit A** to this document

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The DGCD is obligated to address Affirmatively Furthering Fair Housing (AFFH). Specifically, the office is taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity and fostering and maintaining compliance with civil rights and fair housing laws. In general, the City is proactive in encouraging participation in each housing program or project with reminders of affirmatively marketing information starting in the signed written agreements. HOME subrecipients are required to outline an affirmative marketing plan in their application for funding. Several HOME contracts are managed by the City, all of which aim to increase, directly or indirectly, the supply of affordable housing units in Atlanta. All projects that involve the sale and rental of HOME units are contractually obligated to include an affirmative marketing strategy.

HOME projects were actively marketed to eligible persons irrespective of their race, color, religion, gender, national origin, disability or familial status. The City required awardees of funding to advertise via using the logotype, a statement or slogan in any print media. Advertisements expounded that the units were affordable and that they were constructed with the benefit of funds from the City of Atlanta and the U.S. Department of Housing and Urban Development (HUD). Signage was prominently displayed, and records regarding the ethnic and disabled mix for all completed units were retained and are available upon request by the City of Atlanta. Additionally, the office developed and implemented a supplemental monitoring form to adequately address AFFH.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

In 2020, the HOME program received 1,107,389.31 in Program Income. PI is money earned by the HOME program in the form of repayments on HOME funded loans for affordable housing rehabilitation and construction. 1,078,125.33 in Program Income was carried-over from the prior year. Those funds were reallocated to HOME activities. 1,000,000.00 of those funds were allocated to the redevelopment of 399 Holly St SW, Atlanta, GA 30318 and 1,185,514.64 were allocated to the Multi-Family loan pool which DGCD is currently accepting applications for.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

DCGD is actively engaged in many activities aimed at increasing and maintaining affordable housing subject to local needs and preferences. Annually, projects are evaluated for success during the CAPER process and the results may affect programmatic funding preferences in the following year. Using HOME funds, the following types of activities are completed

- Providing rental assistance to low-income families to ensure they can rent a safe and affordable home
- Creating first time homebuyers through down payment assistance
- Acquiring and rehabilitating single-family homes for sale to low-income homebuyers
- Constructing new single-family homes for sale to low-income homebuyers
- Offering TBRA assistance

Offering an open loan pool application process for Entities interested in single and multifamily acquisition, new construction and rehabilitation. This application is open for CHDO's, Developers and Non-profits. Collectively, these strategies work together to assist the office in achieving this objective.

CR-55 - HOPWA 91.520(e)

Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	383	306
Tenant-based rental assistance	400	683
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	292	366
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	391	498
Total	1,466	1,853

Table 14 – HOPWA Number of Households Served

Narrative

The HOPWA Program supported 886 households in facilities. They ranged from permanent facility based medically frail individuals and families to shared housing in facilities that provide substance abuse recovery support. 388 were in permanent housing facilities and 498 were in transitional housing which includes emergency lodging. Also, 76 households received Permanent Housing Placement. In 2020, 406 households received supportive services not in conjunction with HOPWA housing activities. HOPWA project sponsors offered supportive services to homeless persons and those receiving housing assistance to help them obtain residency or stay in their own homes. Services included housing case management, personal care aid, mental health services, substance abuse recovery services, home-delivered meals, legal services, and HIV counseling.

During 2020, 683 households received tenant-based rental assistance, and 306 households were provided short-term rental, mortgage, and utility assistance to prevent homelessness. Approximately 1216 of the households that received housing assistance had extremely low area median income, with 63% having very low area median income. The master-leasing program is the most popular and successful type of housing in the Atlanta EMSA. Three project sponsors provided master-leasing and served 864 households. The COA targets households with very-low income that would not be able to

secure a lease in their name. The annual goal of the 2020 HOPWA program was to provide housing aid to 1466 eligible households. COA HOPWA project sponsors reported 1853 households served in 2020. 400 were projected to receive tenant-based rental assistance and 683 received services. About 383 were expected to receive short-term rental, mortgage and utility assistance as homeless prevention. COA HOPWA project sponsors did not attain that goal with 306 households due to a variety of reasons including the continued COVID-19 pandemic. The Permanent Housing Facilities were projected to serve 683 individuals and surpassed that amount to serve 864.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	ATLANTA
Organizational DUNS Number	065372500
EIN/TIN Number	586000511
Identify the Field Office	ATLANTA
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

ESG Contact Name

Prefix	Ms
First Name	Deborah
Middle Name	0
Last Name	Lonon
Suffix	0
Title	Commissioner, Department of Grants and Community Development

ESG Contact Address

Street Address 1	55 Trinity Avenue
Street Address 2	Ste. 3500
City	Atlanta
State	GA
ZIP Code	30303
Phone Number	4045461895
Extension	0

Fax Number 4049797601

Email Address dblonon@atlantaga.gov

ESG Secondary Contact

Prefix Mr.

First Name Scott

Last Name Walker

Suffix 0

Title Director, Planning & Program Operations

Phone Number 4048658443

Extension 0

Email Address scawalker@atlantaga.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date 01/01/2019

Program Year End Date 12/31/2019

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: ATLANTA

City: Atlanta

State: GA

Zip Code: 30303, 3520

DUNS Number: 065372500

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 44654

Subrecipient or Contractor Name: NICHOLAS HOUSE, INC.

City: NICHOLAS HOUSE, INC.

State: GA

Zip Code: 99999,

DUNS Number:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 40000

Subrecipient or Contractor Name: CLIFTON SANCTUARY MINISTRIES, INC.

City: Atlanta

State: GA

Zip Code: 30307, 2238

DUNS Number: 613192082

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 41475

Subrecipient or Contractor Name: TRAVELERS AID OF METROPOLITAN ATLANTA, INC. (DBA HOPE ATLANTA)

City: Atlanta

State: GA

Zip Code: 30303, 2815

DUNS Number: 086078748

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 178537

Subrecipient or Contractor Name: TRINITY COMMUNITY MINISTRIES, INC.

City: Atlanta

State: GA

Zip Code: 30312, 3000

DUNS Number: 606763639

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 35000

Subrecipient or Contractor Name: COVENANT COMMUNITY, INC.

City: Atlanta

State: GA

Zip Code: 30308, 1907

DUNS Number: 059549134

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 30000

Subrecipient or Contractor Name: COVENANT HOUSE GEORGIA INC

City: Atlanta

State: GA

Zip Code: 30315, 6326

DUNS Number: 008676905

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 66863

Subrecipient or Contractor Name: 24/7 Gateway, LLC

City: Atlanta

State: GA

Zip Code: 30303, 3638

DUNS Number: 603405981

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 30000

Subrecipient or Contractor Name: The Salvation Army - Red Shield

City: Norcross

State: GA

Zip Code: 30093, 1725

DUNS Number: 020732326

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 66864

CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	78
Children	57
Don't Know/Refused/Other	0
Missing Information	0
Total	135

Table 16 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	105
Children	28
Don't Know/Refused/Other	0
Missing Information	0
Total	133

Table 17 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	516
Children	181
Don't Know/Refused/Other	0
Missing Information	0
Total	697

Table 18 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 19 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	699
Children	266
Don't Know/Refused/Other	
Missing Information	
Total	965

Table 20 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	485
Female	459
Transgender	17
Don't Know/Refused/Other	0
Missing Information	4
Total	965

Table 21 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	266
18-24	338
25 and over	361
Don't Know/Refused/Other	
Missing Information	
Total	965

Table 22 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households				
Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	20	0	4	16
Victims of Domestic Violence	125	1	7	117
Elderly	41	5	14	22
HIV/AIDS	26	0	6	20
Chronically Homeless	146	1	20	125

Persons with Disabilities:				
Severely Mentally Ill	252	5	24	223
Chronic Substance Abuse	115	0	16	99
Other Disability	206	18	73	115
Total (unduplicated if possible)	931	30	164	737

Table 23 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	60,590
Total Number of bed-nights provided	36,443
Capacity Utilization	60.15%

Table 24 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	304,238	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	70,545	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	108,570	0	0
Subtotal Homelessness Prevention	108,570	374,783	0

Table 25 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	171,073	27,067	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	289,799	0	0
Subtotal Rapid Re-Housing	460,872	27,067	0

Table 26 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Essential Services	62,942	0	0
Operations	140,000	77,736	0

Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	202,942	77,736	0

Table 27 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2017	2019	2020
Street Outreach	43079	27,178	0
HMIS	0	0	0
Administration	0	15,543	12,347.95

Table 28 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2018	2019	2020
	110,375	522,307	12,347.95

Table 29 - Total ESG Funds Expended

11f. Match Source

	2018	2019	2020
Other Non-ESG HUD Funds	0	840,127	0

Other Federal Funds	0	0	0
State Government	0	0	0
Local Government	0	0	0
Private Funds	0	0	0
Other	0	0	0
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	0	840,127	0

Table 30 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2018	2019	2020
	110,375	1,362,434	12,347.95

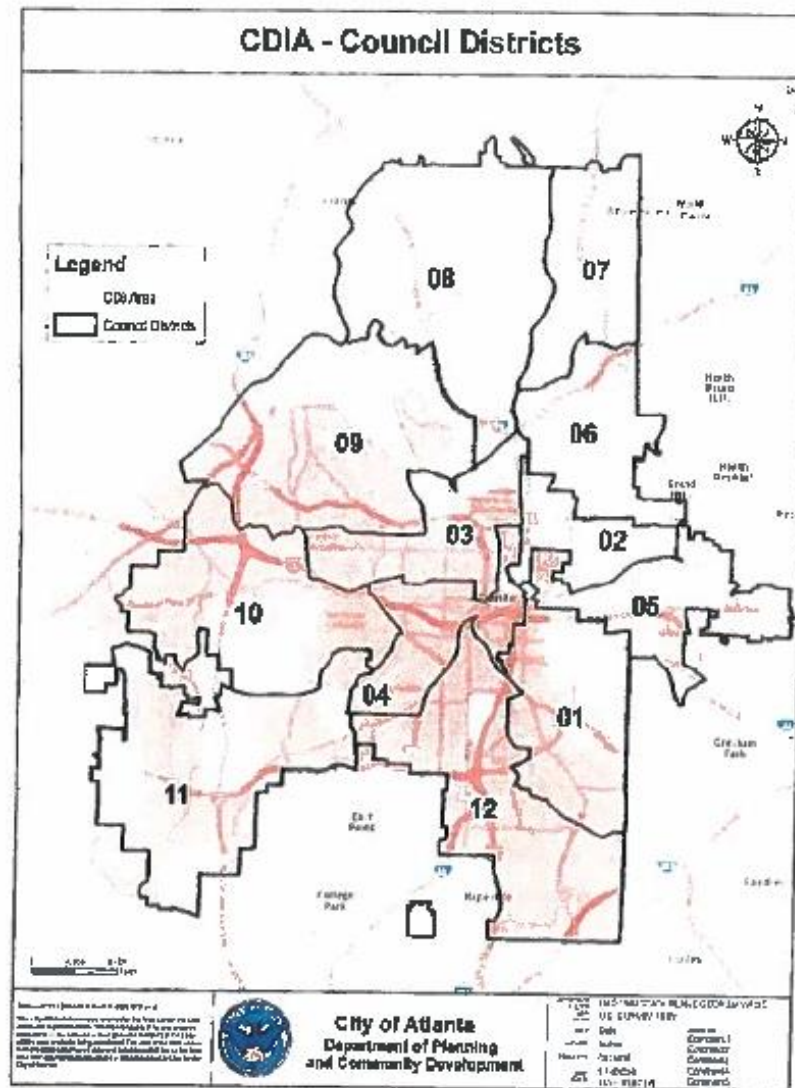
Table 31 - Total Amount of Funds Expended on ESG Activities

Attachments

OMB Control No: 2506-0117 (exp. 09/30/2021)



CAPER – Final Draft May 2021



Previous editions are obsolete.

Form HUD-90110-D (Expiration Date: 10/31/2017)

CDBG and CDBG-CV FINANCIAL SUMMARY

Section 3 Summary Report

AI Action Plan

Metro Fair Housing Services, Inc.
Proposed Statement of Work
Implementation of City of Atlanta's 2013 AI Action Plan to Address Identified Impediments to Fair Housing Choice

Impediments Identified	Actions Required to Address Impediments	AI Proposed Timeline	Responsible City Department/Agency	Metro Consultant Tasks	Implementation Timeline/Completion Date	Reporting/Due Dates	Payment Schedule
1. Lack of compliance with federal, state and local fair housing laws	Action Step 1: Develop referral process for Fair Housing Complaints that includes contact information to all private and public enforcement agencies.	24 months from HUD approval	DHCD/OCs/HRC	Develop initial training modules & present training for OCs and HRC staff	within 6 months from contract start	280 days from contract's effective date	1 st invoice for payment

2. Lack of Knowledge of Fair Housing Protections/Redress	Action Step 1.a. Conduct a public relations campaign promoting knowledge of fair housing laws and assistance programs including, but not limited to, print ads, public service announcements, and community forums.	24-36 months from HUD approval	DHCD/Human Resources/Public Relations	Support & follow up during campaign; document & report results	Ongoing monitoring with report in 6 th , 9 th and 12 th month of contract	At 220 days, 280 days and 375 days from contract's effective date	1 st and 3 rd invoices for payment
	Action Step 2.b. Conduct an online survey to determine the public's knowledge of fair housing laws, means of redress, and levels of perceived discriminatory practices by providers.	Ongoing	DHCD/Human Resources/Public Relations	Determine need and City's intent to continue survey; if continued quarterly coordinate survey questions online	Quarterly from contract's effective date	Quarterly from contract's effective date	1 st and 3 rd invoice for payment
	Action Step 2. Collaborate with surrounding jurisdictions & advocates to seek regional solutions to homelessness & increase supportive housing	24 months from HUD approval	Mayor's Office and DHCD	Regional support for homeless population; Review and document efforts to regionally address supportive housing	Within 11 months from contract's effective date	340 days from contract's effective date	2 nd invoice for payment
	Action Step 3. Research, standardize and reconcile local ordinances and placed laws with federal and state laws	24 months from HUD approval	DHCD/Office of Buildings/CEAM	Establish comprehensive training & monitoring mechanisms for all relevant City employees; and conduct training for relevant City employees	Within 30 days from approval as required above	TBD	TBD

	regarding accessibility in construction, permitting, inspectors, code enforcement, etc. of single-family and multi-family housing. Establish comprehensive, mandatory accessibility training and monitoring mechanisms for all relevant City employees.						
	Action Step 4. Continue enforcement of the City's existing ordinance, ATLANTA GA CODE § 8-2182, regarding accessibility requirements, particularly for construction of new single-family dwellings receiving city funds. Update the established system to ensure compliance with all applicable federal, state and local accessibility laws.	Immediately	DPCD	Document and report compliance with ordinance(s) regarding accessibility	Within 12 months from contract's effective date	375 days from contract's effective date	3 rd Invoice for payment
	Action Step 2. Support & fund down payment and closing cost assistance mechanisms for residents.	35 months from HUD approval	DPCD/DHCD/ Invest Atlanta	Document and report performance	By the 6 th and 12 th months from contract's effective date	210 and 375 days from contract's effective date	3 rd Invoice for payment

	Action Step 3. Establish definitive & quantitative goals for increasing the number of affordable housing units in the City	48 months from HUD approval	Office of Grants Management /DP/CD/DHCD/AMA/ Invest Atlanta	Document & report performance	By the 6 th and 12 th months from contract's effective date	220 and 375 days from contract's effective date	3 rd invoice for payment
	Action Step 4. Identify funding for the demolition of abandoned/neglected properties, utilize "extrem" authority to remove strategically abandoned/neglected properties. To the extent allowable by law, aggressively enforce the vacant property registry requirements. Issue owners who fail to register.	Ongoing	DHCD/Office of Code Compliance Office of Grants Management	Document & report performance	By the 6 th and 12 th months from contract's effective date	220 and 375 days from contract's effective date	1 st and 3 rd invoice for payment
	Action Step 6. Research and implement measures to reduce housing costs that impact housing affordability for renters and homeowners (i.e., provide incentives for low-flow fixtures).	36 months from HUD approval	DHCD/Dept. of Watershed Management	Document & report on measures implemented.	Within 11 months from contract's effective date	340 days from contract's effective date	2 nd invoice for payment
	Action Step 7. Establish Inclusionary Housing Policy with zoning and funding mechanisms to encourage the	48 months from HUD approval	DP/CD	Document & report on policy development and outcomes.	Within 11 months from contract's effective date	340 days from contract's effective date	2 nd invoice for payment